

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹
Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**MFN PARTNERS, LP AND MOBILE STREET HOLDINGS, LLC’S
WITNESS AND EXHIBIT LIST FOR HEARING ON NOVEMBER 12, 2025**

MFN Partners, LP (“MFN”) and Mobile Street Holdings, LLC (“Mobile Street” and collectively, the “MFN Parties”) by and through their undersigned counsel, hereby submits this witness and exhibit list (the “Witness and Exhibit List”) for the hearing scheduled for **November 12, 2025 at 10:00 a.m. (E.T.)** (the “Hearing”) before the Honorable Craig T. Goldblatt at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801, in connection with the *Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors* [Docket No. 6746] and the *Objection of MFN Partners, LP and Mobile Street Holdings, LLC to Confirmation of the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 8102], and any other matters scheduled to go forward at the Hearing.²

¹ A complete list of each of the debtors in these chapter 11 cases (the “Debtors”) may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

² Contemporaneous herewith, the MFN Parties have filed a witness and exhibit list in connection with the *Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors’ Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [Docket No. 6204]. The MFN Parties hereby

WITNESSES

The MFN Parties reserve the right to cross-examine any witness called by any other party.

EXHIBITS

The MFN Parties may, if necessary, seek to introduce some or all of the following exhibits at the Hearing.

No.	Description	Docket, Bates, or Deposition Exhibit No. (if available)
1.	Statement of Financial Affairs of Debtor Yellow Corporation	446
2.	Joinder of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to the Debtors' Omnibus Objection to Personal Injury Claimant Motions for Relief from the Automatic Stay Under Section 362 of the Bankruptcy Code	886
3.	Debtors' Second Omnibus (Substantive) Objection to Proofs of Claim for Withdrawal Liability	1962
4.	The Pension Benefit Guaranty Corporation's Motion for Denial or Dismissal of Debtors' Challenge to PBGC's Regulation Contained in Debtors' Objections to the Proofs of Claim Filed by Certain Multiemployer Pension Plans	2276
5.	The Pension Benefit Guaranty Corporation's Reply in Support of its Motion for Denial or Dismissal of Debtors' Challenge to PBGC's Regulation Contained in Debtors' Objections to the Proofs of Claim Filed by Certain Multiemployer Pension Plans	2500
6.	Statement of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to Debtors' Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claims for WARN Liability	2755
7.	Joinder of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to Debtors' Seventh Omnibus (Substantive) Objection to Proofs of Claims for Withdrawal Liability	3057
8.	The Official Committee of Unsecured Creditors' Objection to the Motion of Debtors for Entry of an Order (I) Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief	3511

incorporate that witness and exhibit list herein by reference. The MFN Parties reserve all rights to call any witnesses and seek admission of any evidence listed on either witness and exhibit list in connection with any matters to be heard.

9.	Transcript for June 3, 2023 hearing	3675
10.	Pension Benefit Guaranty Corporation's Motion for Partial Summary Judgment & Opposition to Summary Judgment For Debtors	3882
11.	Statement of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., Regarding Motions for Summary Judgment Regarding Withdrawal Liability	3998
12.	Memorandum Opinion on summary judgment motions re: withdrawal liability	4326
13.	Pension Benefit Guaranty Corporation's Opposition to MFN Partners, LP's and Mobile Street Holding, LLC's Motion Requesting Reconsideration	4539
14.	Qualified Joinder of the Official Committee of Unsecured Creditors of Yellow Corporation, et al., to the Debtors' Motion to Reconsider in Part the September 13, 2024, Memorandum Opinion Finding Withdrawal Liability Default in Advance of a Withdrawal Liability Payment Obligation	4543
15.	Memorandum Opinion dated November 12, 2024	4846
16.	Response Statement of the Official Committee of Unsecured Creditors Regarding Motion of Debtors for Entry of an Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Voting Procedures, (III) the Forms of Ballots and Notices in Connection Therewith, and (IV) Certain Dates with Respect Thereto	4950
17.	Second Amended Disclosure Statement for the Second Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Solicitation Version]	5027
18.	Second Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code	5028
19.	Order Relating to SFA MEPP Litigation Motions for Summary Judgment and Motions to Reconsider	5057
20.	Joinder of the Official Committee of Unsecured Creditors to Debtors' Twenty-Fourth Omnibus (Substantive) Objection to the Proofs of Claim of the United States of America Filed on Behalf of the United States Environmental Protection Agency, the United States Department of the Interior, and the United States Department of Commerce, National Oceanic and Atmospheric Administration [Claim Nos. 19438 and 19439]	5326
21.	Order Granting Direct Certification of Debtors', MFN Partners, LP's, and Mobile Street Holdings, LLC's Appeal to the United States Court of Appeals for the Third Circuit Pursuant to 28 U.S.C. § 158(d)(2)	5358

22.	Joinder of the Official Committee of Unsecured Creditor to Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1	5451
23.	Motion of the Official Committee of Unsecured Creditors for Entry of an Order Terminating the Debtors' Exclusive Period to Solicit Acceptances of a Plan or, in the Alternative, Converting the Chapter 11 Cases to Cases under chapter 7 of the Bankruptcy Code	5564
24.	Transcript for January 28, 2025 hearing	5588
25.	Plan Supplement for the Second Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliate	5598
26.	Memorandum Opinion regarding cross motions for summary judgment on withdrawal liability dated February 5, 2025	5619
27.	Letter Regarding Sub Judice Matters Jointly Filed by the Debtors and Committee	5982
28.	Third Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors	5995
29.	Third Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of yellow Corporation and its Debtors Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecure Creditors	5996
30.	Plan Supplement for the Third Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code	5997
31.	Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code	6204
32.	Memorandum Opinion Setting Forth Preliminary Observation on Remaining Multiemployer Pension Plan Claims Allowance Disputes	6030
33.	The MFN Parties' Reply in Further Support of the Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code	6507
34.	Transcript for June 17, 2025 hearing	6547
35.	Transcript for July 8, 2025 hearing	6654
36.	Order Relating to Multiemployer Pension Plan Motions for Summary Judgment	6682
37.	Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the	6746

	Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors	
38.	Notice of Filing of Redline Versions of (I) Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtors and the Official Committee of Unsecured Creditors; and (II) Fourth Amended Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtors and the Official Committee of Unsecured Creditors	7136
39.	Fourth Amended Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and tis Debtors Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors	7619
40.	First Amended Plan Supplement for the Fourth amended Joint Chapter 11 Plan of Yellow corporation and its Debtors affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors	7798
41.	MFN Partners, LP's and Mobile Street Holdings, LLC's Objection to Proofs of Claim Filed by New York State Teamsters Conference Pension and Retirement Fund	7603
42.	New York State Teamsters Conference Pension and Retirement Fund's Response to MFN Partners, LP's and Mobile Street Holdings, LLC's Objection to Proofs of Claim Filed by New York State Teamsters Conference Pension and Retirement Fund and Debtors' Joinder Thereto	7731
43.	Reply of the Official Committee of Unsecured Creditors of Yellow Corporation, <i>et al.</i> , to the Objection of MFN Partners, LP and Mobile Street Holdings, LLC to (A) Approval of Fourth Amended Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtors Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (B) Solicitation Procedures Motion	7533
44.	Transcript for September 4, 2025 hearing	7576
45.	Certificate of Mailing of Solicitation Documents by Stephenie Kjontvedt	7775
46.	Plaintiffs' Fourth Notice of Settlement of Avoidance Actions Pursuant to Settlement Procedures Order	7924
47.	Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtors and the Official Committee of Unsecured Creditors (Technical Modifications)	8144
48.	Notice of Filing of Redline Version of Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates	8145

	Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtors and the Official Committee of Unsecured Creditors (Technical Modifications)	
49.	Third Amended Plan Supplement for the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtors and the Official Committee of Unsecured Creditors	8146
50.	Declaration of Brian Whittman in Support of Confirmation of the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed By the Debtors and the Official Committee of Unsecured Creditors	8148
51.	Complaint to Avoid and Recover Transfers Pursuant to 11 U.S.C. §§ 547, 548, and 550 and to Disallow Claims Pursuant to 11 U.S.C. § 502	Adv. No. 25-51542, No. 25-51726, 25-51792, 25-51505, 25-51278, 25-51332, 25-51571, 25-51487, 25-51418, 25-51425, 25-51846, 25-51343, 25-51348, 25-51433, 25-51828, 25-51228, 51212, 25-51442, 25-51620, 25-51807, 25-51828, 25-51457, 25-51211, 25-51605, 25-51742, 25-51756, 25-51850, 25-51235, 25-51350, 25-51693, 25-51648, 25-51754, 25-51778, 25-51794, 25-51816, 25-51292, 25-51335, 25-51359, 25-51535, 25-51646, 25-51567, 25-51408, 25-51431, 25-51338, 25-51583, 25-51511, 25-51261, 25-51707, 25-51258, 25-51548, 25-51779
52.	Notice of Dismissal of Adversary Proceeding	Adv. No. 25-51542, No. 25-51726, 25-51792, 25-51505, 25-51278, 25-51332, 25-51571, 25-51487, 25-51418, 25-51425, 25-51846, 25-51343,

		25-51348, 25-51433, 25-51828, 25-51228, 51212, 25-51442, 25-51620, 25-51807, 25-51828, 25-51457, 25-51211, 25-51605, 25-51742, 25-51756, 25-51850, 25-51235, 25-51350, 25-51693, 25-51648, 25-51754, 25-51778, 25-51794, 25-51816, 25-51292, 25-51335, 25-51359, 25-51535, 25-51646, 25-51567, 25-51408, 25-51431, 25-51338, 25-51583, 25-51511, 25-51261, 25-51707, 25-51258, 25-51548, 25-51779
53.	Order and Judgment Entered by the United States Court of Appeal for the Tenth Circuit dated November 5, 2025	Case No. 24-3111, D.I. 47
54.	Deposition of Brian Whittman (Designations and Counter Designations)	
55.	Central State Pension Fund Board of Trustees (https://mycentralstatespension.org/about-us)	
56.	New York State Teamsters Conference Pension & Retirement Fund Trustees (https://www.nystpensionfund.org/)	
57.	Committee Minutes September 2023 through October 2025	Bates-stamp UCC Yellow 0000015, 0000031, 0000017, 0000033, 0000007, 0000011, 0000013, 0000029, 0000003, 0000027, 0000019, 0000025, 0000023, 0000021, 0000009, 0000001, 0000005, 0000635, 0000632, 0000624, 0000626, 0000630, 0000634, 0000622, 0000628, 0000306, 0000308
58.	Yellow Corporation Board Presentation dated October 1, 2025	Bates-stamp Yellow Debtors

		Confirmation 000191
59.	Yellow Corporation Board Presentation dated October 22, 2025	Bates-stamp Yellow Debtors Confirmation 0008230
60.	Email from K. Zuzolo dated September 3, 2025 to Debtors and Committee Counsel re: Avery-Weigh-Tronix Settlement	Bates-stamp Yellow Debtors Confirmation 0004701
61.	Email from Committee's financial advisor dated June 10, 2025 to Committee counsel, Debtors' counsel, and Central States, and re: waterfall analysis	Bates-stamp Yellow Debtors Confirmation 0004069 & 0004070
62.	Email from B. Berliner dated September 12, 2025 to Debtors counsel and Committee counsel re: Central States settlement	Bates-stamp Yellow Debtors Confirmation 000715
63.	Email from E. Dexter dated October 16, 2025 to Debtors' counsel re: Milbank settlement	Bates-stamp Yellow Debtors Confirmation 0009347
64.	Email from E. Woods dated October 21, 2025 to Debtors' counsel and Committee counsel re: IBT and TNFINC claims	Bates-stamp Yellow Debtors Confirmation 0009342
65.	Emails dated October 8, 2025 from the Committee's financial advisor to the Debtors' financial advisor, Debtors counsel and Committee counsel re: waterfall analysis reflecting ORIC deficiency claim	Bates-stamp Yellow Debtors Confirmation 0008558, 8560 & 8561
66.	Emails between Committee counsel and creditor requesting to be considered for trust board	Bates-stamp Yellow UCC Confirmation 000323
67.	Email dated July 10, 2025 from Debtors' counsel to Committee counsel re: qualitative liquidation analysis	Bates-stamp Yellow Debtors Confirmation 0003571
68.	First Request for Production of Documents from MFN Partners, LP and Mobile Street Holdings, LLC to the Official Committee of Unsecured Creditors Regarding Confirmation of the Fourth Amended Joint Chapter 11 Plan	
69.	First Request for Production of Documents from MFN Partners, LP and Mobile Street Holdings, LLC to the Debtors Regarding Confirmation of the Fourth Amended Joint Chapter 11 Plan	

70.	Email from K. Zuzolo dated April 23, 2025, to Debtors' counsel re: MEPP recovery analysis	Bates-stamp Yellow Debtors Conversion 0000221, 0000222
71.	<i>Any document or pleading filed in the above captioned cases</i>	
72.	<i>Any exhibit necessary for impeachment or rebuttal purposes</i>	
73.	<i>Any exhibit identified or offered by any other party</i>	

RESERVATION OF RIGHTS

The MFN Parties reserve all rights, including but not limited to the right to amend, revise, supplement, or withdraw this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, to call or cross examine any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment or rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence. The MFN Parties reserve all rights to utilize any demonstrative exhibits at the Hearing. The MFN Parties also reserves the right to amend this Witness and Exhibit List at any time prior to the Hearing, including, without limitation, in the event of the filing of any objections, responses, replies, supplemental declarations, or other filings in connection with the Hearing.

Dated: November 10, 2025
Wilmington, Delaware

Respectfully Submitted,

/s/ Maria Kotsiras

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